



Oregon

Kate Brown, Governor

Department of Environmental Quality
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Brett Dugan, Assistant Regional Counsel
Office of Regional Counsel
EPA Region 10, Seattle WA

Via email to: dugan.brett@epa.gov

Re: Request for Testimony of Zach Hedgpeth

Dear Mr. Dugan:

Pursuant to 40 CFR Part 2, Subpart C, the Oregon Department of Environmental Quality (DEQ) requests the testimony of United States Environmental Protection Agency (EPA) Region 10 employee Zach Hedgpeth at a settlement conference and an administrative hearing in the matter of Gas Transmission Northwest LLC, Compressor Station #13 (GTN), DEQ Case No. AQ/RH-HQ-2021-140 (the Order). At the hearing, DEQ will seek a Final Order requiring compliance with OAR 340, Division 223, Round II of Regional Haze.

DEQ seeks the testimony of Mr. Hedgpeth concerning matters that fall within the scope of his employment at EPA Region 10. He will be asked to provide his opinion, as an EPA employee with relevant experience, on DEQ's application of EPA's Air Pollution Control Cost Manual to GTN's facility subject to the Order. Specifically, he will be asked whether DEQ's cost per ton determination, used as a basis for the Order's requirement for GTN to install and operate Selective Catalytic Reduction (SCR) pollution controls and a Continuous Emissions Monitoring System (CEMS), is consistent with EPA's Air Pollution Control Cost Manual. The scope of the testimony will not include the underlying assumptions of Air Pollution Control Cost Manual or an opinion on the approvability of Oregon's draft Regional Haze State Implementation Plan (SIP). DEQ consulted Mr. Hedgpeth prior to issuing the Order and Mr. Hedgpeth has reviewed GTN's Round II Regional Haze submittals.

Mr. Hedgpeth's participation in this administrative hearing is clearly in the interest of EPA. Specifically, GTN has asserted that DEQ's interpretation of the Air Pollution Control Cost Manual is incorrect. EPA has an interest in ensuring a consistent and accurate interpretation of its Air Pollution Control Cost Manual. In addition, EPA has an interest in DEQ's ability to make reasonable progress towards natural visibility conditions in its Class I areas, as required by the Federal Clean Air Act's Regional Haze regulations. The Order is a necessary component of Oregon's Regional Haze SIP.

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I appreciate EPA's attention to this matter. Please let me know if you have any questions. I can be reached by email at kieran.odonnell@deq.state.or.us or by phone at 503-229-5012.

Sincerely,

Kieran O'Donnell, Manager
Office of Compliance and Enforcement

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